UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
v.)	Criminal No. 04-10293-JLT
MARK F. MARCHESE (1),)	
FRANK R. BOWMAN, JR. (2),)	
ANTHONY P. RAYMOND (3),)	
Defendant.)	

GOVERNMENT'S ASSENTED-TO MOTION TO CONTINUE SENTENCING (With respect to Frank R. Bowman, Jr.)

The government hereby respectfully requests, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, that this Court continue the sentencing in this matter (Mr. Bowman) from May 17, 2005, to different date, preferably in late July or in August or September.

The reason for this request is that the government anticipates filing a Motion in support of a reduced sentence for Mr. Bowman, although the government does not anticipate its willingness to file such a Motion until the trial of another defendant has occurred (such trial is currently anticipated in late July).

The defendant, through his counsel, assents to this Motion.

The government, therefore, respectfully requests that this Motion granted and that the sentencing be scheduled at a later date.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By:

/s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

DATE: May 12, 2005

CERTIFICATE OF SERVICE

Suffolk, S.S.

Boston, Massachusetts
April 18, 2005

I, Paul R. Moore, Assistant U.S. Attorney, do hereby certify that I have served a copy of this Motion upon counsel for the defendant, Charles Clifford, on this 12th day of May, 2005, via first class mail.

/s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney